NO. FBT CV 15 6048103 S	**:**	**SUPERIOR COURT**
DONNA L. SOTO, ADMINISTRATRIX OF THE ESTATE OF VICTORIA L. SOTO, ET AL	**:**	**JUDICIAL DISTRICT OF FAIRFIELD**
V.	**:**	**AT BRIDGEPORT**
BUSHMASTER FIREARMS INTERNATIONAL, LLC, a/k/a, ET AL	**:**	**APRIL 27, 2016**

OBJECTION TO MOTIONS TO STAY

The plaintiffs in this action object to the Motions for Stay filed by defendants Remington Outdoor Company, Inc.; Remington Arms Company, LLC; Camfour, Inc.; and Camfour Holding, Inc.[1]

Our rules of practice favor resolution on the merits. For this reason, a party seeking to avoid discovery must make a particularized showing as to why that is appropriate and necessary. No such showing has been made here. Nor can it be. This case has been in suit for fifteen months and no discovery has been accomplished. The plaintiffs have repeatedly begun the discovery process and the defendants have repeatedly resisted moving forward. Now the parties have an agreed on trial date in two years' time. If the parties are to hold that trial date, discovery must proceed.

The defendants' Motions to Stay, moreover, simply repeat bits of the jurisdictional argument they made in their Motions to Dismiss. The defendants appear to forget that the Court resolved the jurisdictional argument *against* them. As a result, discovery is open and should remain open.

For these reasons, and as further set forth below, the Court should deny the Motions to Stay.

I. PROCEDURAL BACKGROUND

This case commenced in December 2014 by writ, summons and complaint. In January 2015, the Remington defendants removed the case to the United States District Court for the District of

[1] The Riverview defendants did not file a Motion to Stay.

Connecticut on a claim of fraudulent joinder. The removal was blatant forum shopping: the Remington defendants perceived a tactical advantage in federal court. And the removal had an added benefit for the defendants, because it effectively stayed discovery.

After ten months, the District Court remanded the case to this Court. The plaintiffs moved ahead with the case, filing a First Amended Complaint as of right on October 30, 2015, and serving Notices of Deposition on the defendants on November 12, 2015 and a first set of Requests for Production on November 13, 2015. The defendants stonewalled again. They appeared at the very first status conference claiming that this Court was without jurisdiction. When asked by the Court whether they would agree to discovery while their Motions to Dismiss were pending, they said no. And again, they succeeded in delaying discovery.

The Motions to Dismiss made substantive attacks on the First Amended Complaint under a thin veneer of jurisdictional argument.[2] The plaintiffs pointed this out and asked the Court to treat the Motions to Dismiss as Motions to Strike. DN 129, Pl. Omnibus Objec. at 9-11. The Remington defendants objected to such an approach, claiming it would be unfair to impose a waiver of their right to file a request to revise. DN 135, Remington Reply, at 8-9.[3] Based in part on this objection, the Court declined to treat the Motions to Dismiss as Motions to Strike. DN 139, Memorandum of Decision at 7 ("Given the potential waiver issues. . . , the way in which the defendants have framed their arguments under a motion to dismiss standard, *and the fact that the defendants disagree with the court treating the motions to dismiss as motions to strike*, it is neither practicable nor desirable for the court to consider the defendants' motions as anything other than motions to dismiss.") (emphasis supplied).

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[2] In fact, the defendants make the very same attacks on the First Amended Complaint now in their Motions to Strike.

[3] It now appears that defendants made this argument for purely tactical reasons and had no true intention of filing Requests to Revise.

Ruling only on the jurisdictional arguments, the Court denied the Motions to Dismiss on April 14, 2016. Again, the plaintiffs moved forward. On April 15, 2016, the plaintiffs re-served the deposition notices that had first been served November 12, 2015 and sought agreement from defendants as to what objection and response dates would be reasonable for the production requests that had been served November 13, 2015. *See* Ex. A, Sterling Email to Counsel regarding Resuming Discovery; Ex. B, 4/15/16 Re-Notices of Deposition. The Remington and Camfour defendants responded by filing Motions to Stay Discovery.

A scheduling order and a trial date of April 3, 2018 are now in place. DN 147, Scheduling Order.

II. STANDARD FOR ISSUANCE OF STAY OF DISCOVERY

Practice Book Section 13-5 governs the determination of motions to stay, commending the decision to the sound discretion of the trial court. *See* Prac. Bk. § 13-5; *Wilcox v. Webster Ins.*, 2008 WL 253054, at *2 (Conn. Super. Jan. 11, 2008) (Bellis, J.). The Remington and Camfour defendants agree that Section 13-5 controls the Court's decision, and that the decision is discretionary. DN 144, Remington Stay Mot. ¶ 3; DN 145, Camfour Stay Mot. ¶ 6.

Section 13-5 requires that a party seeking a protective order show good cause why that order should issue: "The party seeking a protective order under Practice Book § 13-5 bears the burden of establishing the contemplated 'good cause.'" *Contreras v. Enerlume Energy Mgmt. Corp.*, 2008 WL 642968, at *1 (Conn. Super. Feb. 22, 2008) (Scholl, J.). "The showing must involve a particular and specific demonstration of fact, as distinguished from stereotyped and conclusory statements." *Langerman v. John Morganti & Sons, LLC*, 2003 WL 22234615, at *1 (Conn. Super. Jan. 11, 2008) (Bellis J.) (citation omitted); *Clarkson v. Greentree Toyota Corp.*, 8 CSCR 515 (May 24, 1993) (same).

Factors that may be balanced in determining whether to grant a stay include judicial economy, burdensomeness of discovery to the parties, prejudice caused by the stay, the plaintiff's interest in having the claim resolved, and how long the case has been pending. *Wilcox*, 2008 WL 253054, at *2 (identifying as factors judicial economy, burdensomeness, prejudice, interest in resolution); *Southridge Capital Mgmt., LLC v. Twin City Fire Ins. Co.*, 2006 WL 3491382, at *1 (Conn. Super. Nov. 13, 2006) (Beach, J.) (considering how long case had been pending in determining whether to grant stay of discovery); *Contreras*, 2008 WL 642968, at *2 (same).

III. THE MOTIONS TO STAY SHOULD BE DENIED

The Remington and Camfour defendants fail to establish good cause for the issuance of a discovery stay. Fifteen months have passed since the case was returned to this Court; the parties should be six to nine months from trial. Instead, the parties are at the very outset of discovery. The defendants have yet to produce a single witness or a single document. If the defendants obtain a further delay, the parties will not be ready for an April 2018 trial date. One look at the already tight discovery schedule makes that plain.

Nor does PLCAA change the analysis. In fact, the defendants agree that the decision is governed by Practice Book Section 13-5 and the Court's discretion. The defendants have no choice in this concession, because PLCAA contains no provision requiring or even advising a stay of discovery. The defendants' stay arguments are merely a reprise of the jurisdictional argument made in the Motions to Dismiss, which the Court recently considered and rejected.

A. The Case Has Been in Suit Fifteen Months and No Discovery Has Been Done

Even if the Court makes no judgment concerning the propriety of the Remington defendants' removal to federal court and their choice to style their opening motions as jurisdictional, the fact is that because the defendants used these procedural tools, this case has been in suit fifteen months and no

discovery has been produced. The case was ready to commence discovery on January 26, 2015. It is now April 27, 2016, and the defendants have not produced a document, or a witness or answered an interrogatory. Fifteen months is a long time, especially given the way Connecticut dockets currently move.

In a similar situation, Judge Scholl considered whether to grant a motion to stay in a securities class action case. The District Court had dismissed pendent state law claims, which then came before Judge Scholl. The age of the case – eighteen months – was a significant reason for her refusal to enter a stay:

> Lastly, this litigation has already been pending for over a year and a half. In effect the Defendant has already received a stay of discovery for a significant period of time. *To delay discovery further would unreasonably delay the resolution of this matter.*

Contreras v. Enerlume Energy Mgmt. Corp., 2008 WL 642968, at *2 (emphasis supplied).

In a case that has been pending "for a long time," *see Southridge Capital Mgmt., LLC*, 2006 WL 3491382, at *1, as this case has been, it is important that discovery proceed.

B. The Plaintiffs Have a Strong Interest in Proceeding to Trial on the Schedule Agreed by the Parties and Accepted by the Court

The plaintiffs have suffered some of the worst losses imaginable. The case necessarily forces them to remember and re-live these losses. This is the price a plaintiff pays for bringing suit, and the plaintiffs have chosen to bear it. But it is unfair to require them to bear more. This case should last no longer than the time it takes to conduct fair discovery and go to trial in April 2018. If the agreed on

scheduling order is followed with alacrity by both sides, the case will (just barely) be ready for trial in two years. If a stay of discovery is granted, the agreed on schedule will become unworkable.[4]

Discovery delay, moreover, is *not* a neutral factor. Delay benefits the defendants and damages the plaintiffs. This case requires discovery from both the defendants and third parties. As time passes, the memories of witnesses fade, third parties become more difficult to locate, and documentary evidence is more likely to be lost. *E.g. DeLeo v. Nusbaum*, 263 Conn. 588, 596 (2003) ("[T]he search for truth [] may be impaired by the loss of evidence, whether by death or disappearance of witnesses, fading memories, disappearance of documents or otherwise."); *United States v. Labansat*, 94 F.3d 527, 530 (9th Cir. 1996) ("It is common knowledge that memory fades with time."). Those facts of life prejudice the plaintiffs in their preparation of the case, because the plaintiffs bear the burden of proof. The defendants' conduct demonstrates that they understand this. When the Court inquired at a status conference whether the defendants would agree to proceed with discovery during the pendency of the Motions to Dismiss, they said no. For these reasons, discovery must proceed. *See Wilcox*, 2008 WL 253054, at *3 (finding "the plaintiffs' interests in timely adjudication of their claims outweighs the interest in a stay of all discovery").

[4] The Remington and Camfour defendants seek a stay pending resolution of their Motions to Strike, which are scheduled for argument on June 20, 2016. Part of the reason for this scheduling – as opposed to a quicker briefing schedule – is the defendants' counsels' trial schedules in May, in itself not an appropriate basis for a stay. The Court will then have four months to rule on the motions, even though the Court may choose to issue its ruling more expeditiously. It is fair to estimate that the defendants are seeking a delay of at least four months, and perhaps more. If the Court allows that delay, or even a lesser one, it is highly unlikely that the parties will be ready for an April 2018 trial.

C. The Defendants' Substantive Arguments Were Briefed and Ready on February 22, But the Defendants Asked the Court *Not* to Rule on Them

Even though the defendants had briefed their sufficiency arguments in their Motions to Dismiss, they sought an opportunity to re-brief these arguments, and the Court allowed them this "second bite at the apple." Having gained this advantage, the defendants cannot now be permitted to use it to burden the plaintiffs' right to proceed to trial.

The defendants filed Motions to Dismiss that contained extensive attacks on the sufficiency of the allegations of the First Amended Complaint. The plaintiffs pointed this out and asked the Court to treat the Motions to Dismiss as Motions to Strike. DN 129, Pl. Omnibus Objec. at 9-11. At this point, the defendants had two choices. They could have agreed that the Court should treat their Motions to Dismiss as Motions to Dismiss/Strike. If they had done this, they would have obtained an expedited ruling on both the jurisdictional and the sufficiency arguments they had made, and the ruling would have issued while discovery was stayed. The defendants, however, did not choose this course of action.

In fact, the Remington defendants *objected* to such an approach, claiming that it would result in an unfair waiver of their right to file a request to revise. DN 135, Remington Reply, at 8-9.[5] Based in part on this objection, the Court declined to treat the Motions to Dismiss as Motions to Strike and ruled only on the jurisdictional arguments that had been raised. DN 139, Memorandum of Decision at 7.

The point is this: the Remington and Camfour defendants made their bed. They had an opportunity to obtain a speedy ruling on their sufficiency arguments while discovery was suspended. Instead of advocating that approach, they asked the Court *not* to take it. They chose to re-brief the sufficiency issues and to have the Court consider them again. Now they ask the Court to burden the

[5] In hindsight, moreover, it appears the defendants had no actual intention of filing Requests to Revise.

plaintiffs' right to proceed to trial due to *their* tactical choice. If anyone is going to bear a burden as a result of the delay in decision of the sufficiency issues, it should be the defendants, not the plaintiffs.

D. The Defendants Have Not Made a Particularized Showing of Burden

The defendants claim the parties will be burdened if discovery proceeds. They fail, however, to make a particularized showing of burden. "The showing must involve a particular and specific demonstration of fact, as distinguished from stereotyped and conclusory statements." *Langerman v. John Morganti & Sons, LLC*, 2003 WL 22234615, at *1. The defendants have not even attempted to carry this burden.

F. PLCAA Provides No Special Protection from Discovery

The defendants call PLCAA an "immunity," and then use that cover to conflate it with sovereign immunity.[6] In fact, PLCAA is an affirmative defense. *See City of New York v. Mickalis Pawn Shop, LLC*, 645 F.3d 114, 125, 127, 137 (2d Cir. 2011) (deciding that PLCAA could implicate subject matter jurisdiction or could simply be a defense, and deciding PLCAA is a defense). The Court just ruled that PLCAA does not implicate subject matter jurisdiction: "the court concludes that any immunity that PLCAA may provide does not implicate the court's subject matter jurisdiction." DN 139, at 14. The defendants' continued attempt to confuse PLCAA with sovereign immunity fails to give due attention to the Court's ruling. If PLCAA did affect subject matter jurisdiction, then general discovery would come to a halt. As the Court has determined, however, PLCAA does *not* implicate subject matter jurisdiction and therefore discovery is open.

[6] The defendants take cover behind the fact that "immunity" is a term that is used imprecisely. For example, while sovereign immunity implicates subject matter jurisdiction in Connecticut, municipal immunity is merely an affirmative defense.

PLCAA contains no provision addressing discovery. If Congress had intended that an automatic stay of discovery issue in PLCAA cases, it could easily have said so. For example, the Private Securities Litigation Reform Act states:

> (B) Stay of discovery
> In any private action arising under this chapter, all discovery and other proceedings shall be stayed during the pendency of any motion to dismiss, unless the court finds upon the motion of any party that particularized discovery is necessary to preserve evidence or to prevent undue prejudice to that party.

15 U.S.C. § 78u-4. PLCAA contains no such provision.

The defendants cite cases which do not support their argument: none of these cases hold that the availability of a PLCAA defense requires a blanket stay of discovery – nor could they, given the complete absence of statutory language to support that conclusion. *Saucier v. Katz*, 533 U.S. 194 (2001), is a qualified immunity case in which discovery was taken and the case resolved at summary judgment. *See id.* at 200-01 (case was decided on summary judgment); *id. at* 211-12 (case was decided on the basis of pretrial discovery including defendant officer's deposition). *Jeffries v. District of Columbia*, 916 F. Supp. 2d 42 (D.D.C. 2013), in which the Court *sua sponte* dismissed a claim under PLCAA, conflicts with *Mickalis*, 645 F.3d at 125, 127, 137, which treats PLCAA as a waivable defense. And *Phoenix Consulting, Inc. v. Republic of Angola*, 216 F.3d 36 (D.C. Cir. 2000), concerns a subject matter jurisdiction challenge based on the Foreign Sovereign Immunities Act. *Shay v. Rossi*, 253 Conn. 134, 166 (2000), *overruled by Miller v. Egan*, 265 Conn. 301 (2003), is a sovereign

immunity case.[7] The Camfour defendants try the same ploy, citing to *Kelly v. Albertsen*, 114 Conn. App. 600 (2009), another sovereign immunity case involving a claim against a University of Connecticut physician, and *Manifold v. Ragaglia*, 94 Conn. App. 103 (2006), a case against the Commissioner of the Department of Children and Families. The Camfour defendants call the immunity in issue in *Manifold* "statutory immunity," DN 145, Camfour Stay Mot. ¶ 5, which is misleading – this is a *sovereign* immunity case, and the Court just ruled that PLCAA is not equivalent to sovereign immunity, not even a close cousin.

The Remington defendants then attempt a diversion. DN 144, Remington Stay Mot. ¶ 5. Rather than face the fact that PLCAA has no provision which provides for the imposition of a discovery stay, they quote from the findings and purposes section of PLCAA. Congress' failure to include a term concerning discovery stays implies that it did not intend discovery to be stayed. Its explicit preservation of certain causes of action, including claims for negligent entrustment and violation of a state statute applicable to the sale or marketing of a firearm, demonstrates the same intent. *See* 15 U.S.C. § 7903(5)(A)(ii)-(iii). PLCAA's plain language specifically permits these causes of action to proceed against the defendants. Rather than re-briefing that argument here, we refer the Court to Plaintiffs'

[7] The Remington defendants wrongly characterize whether PLCAA provides Remington a defense as "a legal question." DN 144, Remington Stay Mot. ¶ 4. It is more accurately framed as a mixed question of law and fact. *See generally Macomber v. Travelers Prop. & Cas. Corp.*, 261 Conn. 620, 629, 636 (2002) (recognizing that a motion to strike is assessed under "broad, flexible, and permissive standard" that accepts the truth of facts pled as well as "any facts fairly provable thereunder," and denying motion to strike because whether facts were provable under allegations of the complaint presented "questions of mixed fact and law that would require a more detailed factual matrix than is disclosed by the plaintiffs' allegations"); *Girouard v. South Windsor Board of Educ.*, 1997 WL 325402, at *1 (Conn. Super. May 29, 1997) (Sullivan, J.) (denying motion to strike because whether facts provable under the allegations of the complaint would be subject to municipal immunity was a "mixed question of fact and law").

Omnibus Objection to the Motions to Dismiss, DN 129, at pages 17-20, 34-39.[8] But these arguments are really background – the Court need not resolve them to decide this Motion. The primary driver for the Court's decision should be the need to move the case forward toward an April 2018 trial date, in light of the fact that it has been in suit fifteen months.

IV. CONCLUSION

For these reasons, the Motions to Stay should be denied.

THE PLAINTIFFS,

By **/s/ Alinor C. Sterling**

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[8] The Remington defendants acknowledge that PLCAA's language concerning "immediate[] dismiss[al]" applies specifically to cases that were pending at the time PLCAA was passed. 15 U.S.C. § 7902(b); Remington Stay Mot. ¶ 5 ("[L]awsuits against firearms manufacturers *that were pending when the PLCAA became law* were to 'be immediately dismissed'") (emphasis supplied). This is an obvious but relevant point: the "immediate[] dismiss[al]" language does *not* apply to all cases that implicate PLCAA, and it does *not* apply to this case. It applies only to cases pending at the time PLCAA was passed.

CERTIFICATION

This is to certify that a copy of the foregoing has been mailed, postage prepaid, and emailed this day to all counsel of record, to wit:

For Bushmaster Firearms International LLC, a/k/a;
Freedom Group, Inc., a/k/a;
Bushmaster Firearms, a/k/a;
Bushmaster Firearms, Inc., a/k/a;
Bushmaster Holdings, Inc., a/k/a
Remington Arms Company, LLC, a/k/a;
Remington Outdoor Company, Inc., a/k/a

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/s/ Alinor C. Sterling
JOSHUA D. KOSKOFF
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KATHERINE MESNER-HAGE

EXHIBIT A

From: Alinor A. Sterling
Sent: Friday, April 15, 2016 3:07 PM
To: James Vogts <jvogts@smbtrials.com>; 'Scott Harrington' <SHarrington@dmoc.com>; firm@berrylawllc.com; Scott Allan (sallan@renzullilaw.com) <sallan@renzullilaw.com>; crenzulli@renzullilaw.com; 'Andrew Lothson' <alothson@smbtrials.com>; 'jwhitcomb@dmoc.com' <jwhitcomb@dmoc.com>
Cc: Josh D. Koskoff <JKoskoff@Koskoff.com>; Katherine Mesner-Hage <KHage@Koskoff.com>; Jessica Roberts <JRoberts@Koskoff.com>; Diana V. Orozco <DOrozco@Koskoff.com>; Dolores Vitka <DVitka@Koskoff.com>
Subject: Soto v. Bushmaster, et al./Resuming Discovery

Counsel:

As you will recall, before you filed Motions to Dismiss, we had served corporate designee notices. Those were served on November 12, 2015 for dates in January 2016. On November 13, 2015, we had also served a first set of Requests for Production on each of you. Per a conversation with Jim Vogts, and based on the Court's indication that it would not permit discovery to proceed until your jurisdictional claims were resolved, we agreed to temporarily suspend your obligation to respond to the designee notices and RFPs. At the time we agreed to suspend, 26 days had run on your 30 day period to respond to the RFPs, and 27 days had run since the designee notices were served.

I am re-serving the corporate designee notices today with dates in the relatively near future. I am happy to revise the times and locations of these depositions, within reason, if you advise me of a need to do so and provide acceptable alternatives.

With regard to the RFPs, it seems reasonable to give you another seven days – until Friday April 22 -- in which to serve any objections. Since the RFPs had been served 26 days before we agreed to suspend them, I presume those objections are ready or nearly ready. Please confirm your agreement to this time frame, or let me know what you propose alternatively. If you do not intend to object to discovery and need more time to produce documents, please let me know and we can try to work out a reasonable deadline for production.

I am available on Monday to discuss these matters, if that would be helpful.

Alinor

EXHIBIT B

NO. FBT CV 15 6048103 S	**:**	**SUPERIOR COURT**
DONNA L. SOTO, ADMINISTRATRIX OF THE ESTATE OF VICTORIA L. SOTO, ET AL	**:**	**JUDICIAL DISTRICT OF FAIRFIELD**
V.	**:**	**AT BRIDGEPORT**
BUSHMASTER FIREARMS INTERNATIONAL, LLC, a/k/a, ET AL	**:**	**APRIL 15, 2016**

NOTICE OF DEPOSITION OF REMINGTON ARMS COMPANY, LLC'S CORPORATE DESIGNEE CONCERNING SAFETY POLICIES AND PRACTICES

PLEASE TAKE NOTICE that, pursuant to Practice Book §13-27(h), the plaintiffs in the above-captioned matter request that the DEFENDANT REMINGTON ARMS COMPANY, LLC ("the Company"), identify and produce for videotaped deposition the person most knowledgeable to testify for it on the topics listed below on WEDNESDAY, MAY 4, 2016, at 10:00 AM at the law offices of KOSKOFF KOSKOFF & BIEDER, 350 FAIRFIELD AVENUE, BRIDGEPORT, CT before a notary or other competent authority. The Company is hereby defined to include any and all predecessor entities to the Company, and/or aliases of the Company.

Please be advised that this Notice of Deposition and Request for Production of Documents uses and incorporates the definitions sets forth in Practice Book Section 13-1.

The topics for testimony for the designee(s) of the Company are as follows:

1. The Company's present and historical policies and/or practices, including those in writing, if any, concerning safe sale of firearms, the safety of users of firearms, and/or the protection of the public from the unlawful use of firearms, at the current time and at any time since the inception of the Company;
2. The identity of the persons at the Company responsible for determining, and/or writing and/or ensuring the implementation of these policies and practices until now.

FURTHER, pursuant to Practice Book Section 13-27(g), the plaintiffs request that the designee(s) produce at such deposition the following:

A. Documents concerning the Company's present and historical policies and practices concerning safe sale of firearms, the safety of users of firearms, and the protection of the public from the unlawful use of firearms from the inception of the Company until the present day.

THE PLAINTIFFS,

By _____

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V.	**:**	**AT BRIDGEPORT**
BUSHMASTER FIREARMS INTERNATIONAL, LLC, a/k/a, ET AL	**:**	**APRIL 15, 2016**

NOTICE OF DEPOSITION OF REMINGTON OUTDOOR COMPANY, INC.'S CORPORATE DESIGNEE CONCERNING SAFETY POLICIES AND PRACTICES

PLEASE TAKE NOTICE that, pursuant to Practice Book §13-27(h), the plaintiffs in the above-captioned matter request that the DEFENDANT REMINGTON OUTDOOR COMPANY, INC. ("the Company"), identify and produce for videotaped deposition the person most knowledgeable to testify for it on the topics listed below on FRIDAY, MAY 6, 2016, at 10:00 AM at the law offices of KOSKOFF KOSKOFF & BIEDER, 350 FAIRFIELD AVENUE, BRIDGEPORT, CT before a notary or other competent authority. The Company is hereby defined to include any and all predecessor entities to the Company, and/or aliases of the Company.

Please be advised that this Notice of Deposition and Request for Production of Documents uses and incorporates the definitions sets forth in Practice Book Section 13-1.

The topics for testimony for the designee(s) of the Company are as follows:

1. The Company's present and historical policies and/or practices, including those in writing, if any, concerning safe sale of firearms, the safety of users of firearms, and/or the protection of the public from the unlawful use of firearms, at the current time and at any time since the inception of the Company;
2. The identity of the persons at the Company responsible for determining, and/or writing and/or ensuring the implementation of these policies and practices until now.

FURTHER, pursuant to Practice Book Section 13-27(g), the plaintiffs request that the designee(s) produce at such deposition the following:

A. Documents concerning the Company's present and historical policies and practices concerning safe sale of firearms, the safety of users of firearms, and the protection of the public from the unlawful use of firearms from the inception of the Company until the present day.

THE PLAINTIFFS,

By _____

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V.	**:**	**AT BRIDGEPORT**
BUSHMASTER FIREARMS INTERNATIONAL, LLC, a/k/a, ET AL	**:**	**APRIL 15, 2016**

NOTICE OF DEPOSITION OF CAMFOUR INC.'S CORPORATE DESIGNEE ON SAFETY POLICIES AND PRACTICES

PLEASE TAKE NOTICE that, pursuant to Practice Book §13-27(h), the plaintiffs in the above-captioned matter request that the DEFENDANT CAMFOUR, INC. ("the Company") identify and produce for videotaped deposition the person most knowledgeable to testify for it on the topics listed below on TUESDAY, MAY 10, 2016, at 10:00 AM at the law offices of KOSKOFF KOSKOFF & BIEDER, 350 FAIRFIELD AVENUE, BRIDGEPORT, CT before a notary public or other competent authority. The Company is hereby defined to include any and all predecessor entities to the Company, and/or aliases of the Company.

Please be advised that this Notice of Deposition and Request for Production of Documents uses and incorporates the definitions sets forth in Practice Book Section 13-1.

The topics for testimony for the designee(s) of the Company are as follows:

1. The Company's present and historical policies and/or practices, including those in writing, if any, concerning safe sale of firearms, the safety of users of firearms, and/or the protection of the public from the unlawful use of firearms, at the current time and at any time since the inception of the Company.
2. The identity of the persons at the Company responsible for writing, ensuring the implementation of the policies and practices until now.

FURTHER, pursuant to Practice Book Section 13-27(g), the plaintiffs request that the designee(s) produce at such deposition the following:

A. Documents concerning the Company's present and historical policies and practices concerning safe sale of firearms, the safety of users of firearms, and the protection of the public from the unlawful use of firearms from the inception of the Company until the present day.

THE PLAINTIFFS,

By _____

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JURIS #32250

NO. FBT CV 15 6048103 S	**:**	**SUPERIOR COURT**
DONNA L. SOTO, ADMINISTRATRIX OF THE ESTATE OF VICTORIA L. SOTO, ET AL	**:**	**JUDICIAL DISTRICT OF FAIRFIELD**
V.	**:**	**AT BRIDGEPORT**
BUSHMASTER FIREARMS INTERNATIONAL, LLC, a/k/a, ET AL	**:**	**APRIL 15, 2016**

NOTICE OF DEPOSITION OF CAMFOUR HOLDING, LLP'S CORPORATE DESIGNEE ON SAFETY POLICIES AND PRACTICES

PLEASE TAKE NOTICE that, pursuant to Practice Book §13-27(h), the plaintiffs in the above-captioned matter request that the DEFENDANT CAMFOUR HOLDING, LLP ("the Company"), identify and produce for videotaped deposition the person most knowledgeable to testify for it on the topics listed below on TUESDAY, MAY 10, 2016, at 2:00 PM at the law offices of KOSKOFF KOSKOFF & BIEDER, 350 FAIRFIELD AVENUE, BRIDGEPORT, CT before a notary public or other competent authority. The Company is hereby defined to include any and all predecessor entities to the Company, and/or aliases of the Company.

Please be advised that this Notice of Deposition and Request for Production of Documents uses and incorporates the definitions sets forth in Practice Book Section 13-1.

The topics for testimony for the designee(s) of the Company are as follows:

1. The Company's present and historical policies and/or practices, including those in writing, if any, concerning safe sale of firearms, the safety of users of firearms, and/or the protection of the public from the unlawful use of firearms, at the current time and at any time since the inception of the Company.
2. The identity of the persons at the Company responsible for writing, ensuring the implementation of the policies and practices until now.

FURTHER, pursuant to Practice Book Section 13-27(g), the plaintiffs request that the designee(s) produce at such deposition the following:

A. Documents concerning the Company's present and historical policies and practices concerning safe sale of firearms, the safety of users of firearms, and the protection of the public from the unlawful use of firearms from the inception of the Company until the present day.

THE PLAINTIFFS,

By 

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JURIS #32250

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DONNA L. SOTO, ADMINISTRATRIX OF THE ESTATE OF VICTORIA L. SOTO, ET AL	**:**	**JUDICIAL DISTRICT OF FAIRFIELD**
V.	**:**	**AT BRIDGEPORT**
BUSHMASTER FIREARMS INTERNATIONAL, LLC, a/k/a, ET AL	**:**	**APRIL 15, 2016**

NOTICE OF DEPOSITION OF RIVERVIEW GUN SALES, INC. AKA RIVERVIEW GUN SALES' CORPORATE DESIGNEE ON SAFETY POLICIES AND PRACTICES

PLEASE TAKE NOTICE that, pursuant to Practice Book §13-27(h), the plaintiffs in the above-captioned matter request that the DEFENDANT RIVERVIEW GUN SALES, INC. AKA RIVERVIEW GUN SALES ("the Company"), identify and produce for videotaped deposition the person most knowledgeable to testify for it on the topics listed below on THURSDAY, MAY 12, 2016 at 10:00 AM at the law offices of KOSKOFF KOSKOFF & BIEDER, 350 FAIRFIELD AVENUE, BRIDGEPORT, CT before a notary public or other competent authority. The Company is hereby defined to include any and all predecessor entities to the Company, and/or aliases of the Company.

Please be advised that this Notice of Deposition and Request for Production of Documents uses and incorporates the definitions sets forth in Practice Book Section 13-1.

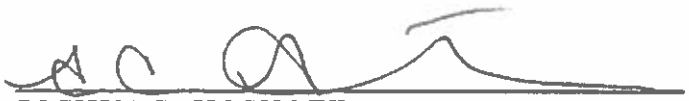
The topics for testimony for the designee(s) of the Company are as follows:

1. The Company's present and historical policies and/or practices, including those in writing, if any, concerning safe sale of firearms, the safety of users of firearms, and/or the protection of the public from the unlawful use of firearms, at the current time and at any time since the inception of the Company.
2. The identity of the persons at the Company responsible for writing, ensuring the implementation of the policies and practices until now.

FURTHER, pursuant to Practice Book Section 13-27(g), the plaintiffs request that the designee(s) produce at such deposition the following:

A. Documents concerning the Company's present and historical policies and practices concerning safe sale of firearms, the safety of users of firearms, and the protection of the public from the unlawful use of firearms from the inception of the Company until the present day.

THE PLAINTIFFS,

By 

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